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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
REPLY IN SUPPORT OF ITS JUNE 15,  
2017 LETTER BRIEF REGARDING  
PRIVILEGE ISSUES**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Reply in Support of its June 15, 2017 Letter Brief Regarding Privilege Issues (the “Letter Brief”). Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Letter Brief	Portions highlighted in blue	Defendants
Exhibit 1 to the Declaration of Melissa Baily	Entire Documents	Defendants

### **I. LEGAL STANDARD**

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

### **II. UBER’S CONFIDENTIAL INFORMATION**

Waymo seeks to seal the portions of the Letter Brief and Exhibit 1 to the Declaration of Melissa Baily only because Defendants have designated the information confidential and/or highly confidential. Declaration of Lindsay Cooper, ¶ 3. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules. *Id.* ¶ 4.

### **III. CONCLUSION**

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s Administrative Motion.

DATED: June 20, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

By /s/ Charles K. Verhoeven

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